

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	14 CV 07433
v.)	
)	
PARTITION PROS, INC., a dissolved Illinois)	
corporation and KEVIN J. DUROS,)	Judge Kocoras
individually and doing business as Partition)	
Pros, Inc.)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR ENTRY OF JUDGMENT BY DEFAULT

Plaintiffs, the CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND, *ET AL.* (collectively "Trust Funds"), by their attorney Kevin P. McJessy, hereby move this Court pursuant to Federal Rule of Civil Procedure 55 to enter a judgment by default against PARTITION PROS, INC., a dissolved Illinois corporation ("PARTITION"), and KEVIN J. DUROS, individually and doing business as Partition Pros, Inc. ("DUROS") (collectively PARTITION and DUROS are referred to herein as "Defendants"). In support of their motion, Trust Funds state as follows:

COMPLAINT

1. The Trust Funds filed a complaint against the Defendants under the Employee Retirement Income Security Act ("ERISA") for amounts owed based on an audit of Defendants' books and records. The Trust Funds seek unpaid contributions, interest and liquidated damages, attorneys' fees and costs and auditors' fees owed by Defendants pursuant to the terms of a collective bargaining agreement and applicable trust agreements.

2. On September 26, 2014, Defendants were served with copies of the summons and complaint. A copy of the Return of Service for each Defendant was filed with the U.S. Clerk of Court on October 2, 2014. *See* Affidavit of Service, Docket Report Nos. 4 and 5. Defendants have failed to answer or appear.

3. This Court should enter a judgment by default against the Defendants pursuant to Federal Rule of Civil Procedure 55(a) because the Defendants have failed to answer or otherwise plead.

AUDIT FINDINGS

4. PARTITION is signatory to the collective bargaining agreement with the Chicago & Northeast Illinois Regional Council of Carpenters. *See* Decl. of J. Libby ¶3, Exhibit A. DUROS is bound by the collective bargaining agreement as a result of continuing to do business as PARTITION after PARTITION was dissolved.

5. Pursuant to the Agreement and ERISA, Defendants are required to pay fringe benefit contributions to the Trust Funds for work performed by Defendants' employees and non-union subcontractors performing work falling within the jurisdiction of the Union. *See* Decl. of J. Libby ¶4, Exhibit A; 29 U.S.C. §1132.

6. Pursuant to the Agreement and ERISA, Defendants must submit to a periodic audit of their books and records in order to verify the accuracy of the contributions reported and paid to the Trust Funds. *See* Decl. of J. Libby ¶5, Exhibit A; 29 U.S.C. §1059.

7. The Trust Funds engaged Legacy Professionals, LLP ("Legacy") to conduct an audit of Defendants' fringe benefit contributions to the Trust Funds for the period January 1, 2012 through September 30, 2013. *See* Decl. of J. Libby ¶6, Exhibit A.

8. After completing the audit, Legacy prepared Audit Reports of Legacy's findings. According to the Audit Reports, Defendants owe the Trust Funds \$21,126.87 in unpaid fringe benefit contributions for the Audit Period. *See* Decl. of J. Libby ¶7, Exhibit A.

9. The Trust Funds made demands for Defendants to pay the amount due. *See* Decl. of J. Libby ¶9, Exhibit A. Defendants failed to pay the amount due. Because Defendants failed to comply with the terms of the Agreement, the Trust Funds have had to employ the services of attorneys McJessey, Ching & Thompson, LLC to file a lawsuit to compel Defendants' compliance with the Agreement. As a result, the Trust Funds incurred attorneys' fees and costs. Under the terms of the Agreement, Defendants are liable for the auditors' fees and attorneys' fees and costs. *See* Decl. of J. Libby ¶9, Exhibit A.

DAMAGES

10. The Trust Funds now seek entry of an order of default against the Defendants ordering Defendants:

- A. to pay the Trust Funds unpaid fringe benefit contributions of \$21,126.87, *see* Decl. of J. Libby ¶7, Exhibit A;
 - B. to pay auditor's fees of \$5,083.20 incurred by the Trust Funds to date to complete the audit of Defendants' books and records, *see* Decl. of J. Libby ¶11, Exhibit A;
 - C. to pay interest of \$1,304.58 on the amount that is due, *see* Decl. of J. Libby ¶10, Exhibit A;
 - D. to pay liquidated damages of \$4,410.20 on the amount that is due, *see* Decl. of J. Libby ¶10, Exhibit A;
 - E. to pay \$1,842.07 in reasonable attorneys' fees and costs the Trust Funds incurred in this action and any attorneys' fees that the Trust Funds will incur to obtain full compliance with this Order, *see* Decl. of J. Libby ¶9, Exhibit A, Decl. of K. McJessey ¶4, Exhibit C; and
 - F. to award the Trust Funds such other and further relief as the Court deems just and equitable.
11. A draft proposed order is attached as Exhibit B.

WHEREFORE, the Trust Funds respectfully request that the Court enter judgment in their favor and against Defendants in the amount of \$33,766.92 for:

- A. unpaid fringe benefit contributions of \$21,126.87;
- B. auditor's fees of \$5,083.20 incurred by the Trust Funds to date to complete the audit of Defendants' books and records;
- C. interest of \$1,304.58 on the amount that is due;
- D. liquidated damages of \$4,410.20 on the amount that is due;
- E. \$1,842.07 in reasonable attorneys' fees and costs the Trust Funds incurred in this action and any attorneys' fees that the Trust Funds will incur to obtain full compliance with this Order; and
- F. such other and further relief as the Court deems just and equitable.

CHICAGO REGIONAL COUNCIL OF
CARPENTERS PENSION FUND *et al.*

By: s/ Kevin P. McJessy
One of their attorneys

Kevin P. McJessy
MCJESSY, CHING & THOMPSON, LLC
3759 North Ravenswood, Suite 231
Chicago, Illinois 60613
(773) 880-1260
(773) 880-1265 (facsimile)
mcjessy@MCandT.com

CERTIFICATE OF SERVICE

I, Kevin P. McJessy, an attorney, certify that I caused the foregoing **Plaintiffs' Motion For Entry Of Judgment By Default** to be served upon

Partition Pros, Inc.
c/o Kevin Duros, Registered Agent
988 Longford Rd.
Bartlett, IL 60103

Kevin Duros
988 Longford Rd.
Bartlett, IL 60103

via U.S. Mail deposited in the United States Mail Depository at 3759 N. Ravenswood, Chicago, Illinois, postage prepaid, this 20th day of November 2014.

s/ Kevin P. McJessy _____
Kevin P. McJessy

14 CV 07433

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	14 CV 07433
v.)	
)	
PARTITION PROS, INC., a dissolved Illinois)	
corporation and KEVIN J. DUROS,)	Judge Kocoras
individually and doing business as Partition)	
Pros, Inc.)	
)	
Defendant.)	

DECLARATION OF JOHN LIBBY

I, John Libby, hereby declare, under penalty of perjury pursuant to the laws of the United States, that the following statements are true to the best of my knowledge information and belief:

1. I am the Manager, Audits & Collections for the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively "the Trust Funds").

2. As part of my duties, I am responsible for managing the collection of contributions for medical, pension and other benefits due from numerous employers pursuant to collective bargaining agreements between the employers and the Chicago and Northeast Illinois Regional Council of Carpenters ("Union") and between employers and the United Brotherhood of Carpenters and Joiners of America.

3. PARTITION PROS, INC. ("Defendant") is an employer bound by a collective bargaining agreement with the Union ("Area Agreement"). A copy of the Agreement dated

January 1, 2009 between Defendant and the Union by which Defendant agreed to be bound by the Area Agreement is attached as Exhibit A-1. The Agreement binds Defendant to the Area Agreement with the Union and the trust agreements establishing the Trust Funds. The Agreement, the Area Agreement and the trust agreements are collectively referred to herein as "Agreements."

4. Pursuant to the Agreements, Defendant is required to pay fringe benefit contributions to the Trust Funds for work performed by Defendant's employees and non-union subcontractors performing work falling within the jurisdiction of the Union.

5. Pursuant to the Agreements, Defendant also agreed to submit to a periodic audit of its books and records in order to verify the accuracy of the contributions reported and paid to the Trust Funds.

6. The Trust Funds engaged Legacy Professionals, LLC ("Legacy") to conduct an audit of Defendant's fringe benefit contributions to the Trust Funds for the period January 1, 2012 through September 30, 2013.

7. Defendant produced records to Legacy. Legacy prepared a report of Defendant's fringe benefit contributions to the Trust Funds based on Legacy's review of the records produced by Defendant. Legacy delivered a copy of its Audit Reports to the Trust Funds for each of Defendant's accounts. The Trust Funds maintain a copy of Legacy's Audit Reports in their files as part of their ordinary course of business. Copies of the Audit Reports prepared by Legacy after its review of records produced by Defendant are attached as Exhibit A-2, A-3 and A-4. According to the Audit Reports and based on the records produced by Defendant to Legacy, Defendant owes \$21,126.87 in unpaid fringe benefit contributions to the Trust Funds.

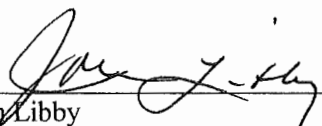
8. The Agreements provide that the Trust Funds collect liquidated damages on unpaid fringe benefit contributions at a rate of 1½ percent compounded monthly and capped at 20 percent. The Agreements also provide that the Trust Funds collect interest on unpaid fringe benefit contributions as allowed by law.

9. The Trust Funds made demands on Defendant to pay the amount due but Defendant failed and/or refused to pay the amount owed to the Trust Funds. Copies of the Trust Funds' demands are attached as Exhibit A-5. Because Defendant failed to comply with the terms of the Agreements, the Trust Funds have had to employ the services of attorney McJessey Ching & Thompson, LLC. As a result, the Trust Funds incurred attorneys' fees and costs.

10. A summary of the updated calculations of accrued interest and liquidated damages as of November 17, 2014 is attached hereto as Exhibit A-6. Defendant owes \$1,304.58 in unpaid interest calculated pursuant to 26 U.S.C. §6621 and \$4,410.20 in unpaid liquidated damages calculated in accordance with the Agreements.

11. The Trust Funds paid Legacy \$5,083.20 as auditors' fees for Legacy to conduct its review of Defendant's books and records and to prepare the Audit Reports.

12. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.



John Libby

11/18/14

Date

14 CV 07433

Exhibit A-1

Memorandum of Agreement

Employer Partition Pros, Inc.

Address 138 S. Oak Street

City Bartlett

State IL

Zip

60103

Phone

630-830-3300

THIS AGREEMENT is entered into between the Chicago Regional Council of Carpenters ("Union") and the Employer, including its successors and assigns covering the geographic jurisdiction of the Union including the following counties in Illinois: Boone, Bureau, Carroll, Cook, De Kalb, DuPage, Grundy, Henderson, Henry, Iroquois, Jo Daviess, Kane, Kankakee, Kendall, Lake, La Salle, Lee, Marshall, McHenry, Mercer, Ogle, Putnam, Rock Island, Stark, Stephenson, Whiteside, Will, Winnebago. The following counties in Iowa: Allamakee, Appanoose, Benton, Black Hawk, Bremer, Buchanan, Butler, Cedar, Cerro Gordo, Chickasaw, Clayton, Clinton, Davis, Delaware, Des Moines, Dubuque, Fayette, Floyd, Franklin, Grundy, Hancock, Henry, Howard, Iowa, Jackson, Jefferson, Johnson, Jones, Keokuk, Kossuth, Lee, Linn, Louisa, Mahaska, Mitchell, Monroe, Muscatine, Scott, Tama, Van Buren, Wapello, Washington, Wayne, Winnebago, Winneshiek, Worth, Wright. The following counties in Wisconsin: Kenosha, Milwaukee, Ozaukee, Racine, Washington and Waukesha. The Union and the Employer do hereby agree to the following:

1. The Employer recognizes the Union as the sole and exclusive bargaining representative on behalf of its employees who are working within the territorial and occupational jurisdiction of the Union.

2. The Employer has reviewed sufficient evidence and is satisfied that the Union is the exclusive bargaining representative of a majority of its employees presently working within the territorial and occupational jurisdiction of the Union.

3. The Employer and the Union agree to incorporate into this Memorandum Agreement and to be bound by the Agreements negotiated between the Chicago Regional Council of Carpenters and various employers and employer associations, including all Area Agreements for the period beginning with the execution of this Memorandum Agreement and ending on the expiration dates of the various successor Agreements which are incorporated herein (see attached list). Unless the Employer provides written notice by certified mail to the Chicago Regional Council of its desire to terminate or modify the Agreement at least three (3) calendar months prior to the expiration of such Agreements, the Agreement shall continue in full force and effect through the full term and duration of all subsequent Agreements which are incorporated by reference.

4. The Employer agrees to be bound to the terms of the various Trust Agreements. Contributions are required to be made under the Agreements incorporated in Paragraph 3, including all rules and regulations adopted by the Trustees of each Fund.

In Witness Whereof the parties have executed this Memorandum of Agreement on this First day of January, 2009.

EMPLOYER

Ken Dumas
Ken Dumas Pres
Print Name and Title

CHICAGO REGIONAL COUNCIL
OF CARPENTERS

Keith Furtner
Authorized Regional Council
Representative

14 CV 07433

Exhibit A-2

Legacy Professionals LLP

Records Reviewed

Account Number:	51200	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123	Phone:	(847) 888-8181
Phone:	(847) 888-8181		

Audit Results

Discrepancy Total Hours	0.00
Discrepancy Benefit Hours	954.00
Discrepancy Amount	\$12,366.46
Liquidated Damages	\$2,326.20
Grand Total	\$ 14,692.66

Associated Account(s)

Partition Pros Inc (#24772)

Reviewed

Employer Records

Yes	Annual Federal Unemployment Tax Return (940)
Yes	Bank Statements
No	Cash Disbursement Journals
Yes	Check Register / Cancelled Checks / Vouchers
N/A	Construction Loan Data
N/A	Contribution Reports to All Other Funds
Yes	Contribution Reports to Audited Funds
Yes	Federal Income Tax Returns (1120 or 1065)
No	General Ledgers
No	Individual Earnings Records
Incomplete	Invoices from Sub-Contractors
No	Job List/Job Cost Records
N/A	Miscellaneous Income Payment Reports (1099)
Yes	Payroll Journals
Yes	Quarterly Federal Tax Returns (941)
Yes	Quarterly Unemployment Wage Reports
N/A	Summary of Information Returns (1096)
Yes	Time Cards
Yes	Transmittal of Income and Tax Statements (W-3)
No	Vendor List
Yes	Wage and Tax Statements (W-2)

Audit Type: Associated Account

Date Reviewed:

6/2/14

Reviewer:

Vivian Anselmi CPA

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[illegible]

Discrepancy Summary By Error Type

Account Number:	51200	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123		
Phone:	(847) 888-8181	Page:	2 of 20

Code	Description	Dollar Amount
SIGNATORY EMPLOYER: PAYROLL		
P1	Clerical Error	\$1,011.75
P1T	Clerical Error - Time Card	\$1,865.35
SIGNATORY EMPLOYER: CASH DISBURSEMENTS		
CD15	Bonus/Additional Pay	\$6,295.57
CD43	Non-signatory subcontractor 33% Labor Factor	\$3,193.79
Sub-Total Discrepancies From All Listed Codes		\$12,366.46
Liquidated Damages		\$2,326.20
Total Amount Due		\$14,692.66

Liquidated Damages Schedule

Account Number:	51200	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Parlition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123		
Phone:	(847) 888-8181	Page:	3 of 20

Reporting Period	Contributions Due	Compounding Periods	Calculating Percentage	Total Liquidated Damages Owed
February 2012	\$67.87	26.00	20.00%	\$13.57
May 2012	\$3,276.27	23.00	20.00%	\$655.25
June 2012	\$1,045.31	22.00	20.00%	\$209.06
July 2012	\$79.14	21.00	20.00%	\$15.83
August 2012	\$379.21	20.00	20.00%	\$75.84
September 2012	\$1,239.86	19.00	20.00%	\$247.97
October 2012	\$718.86	18.00	20.00%	\$143.77
November 2012	\$1,022.23	17.00	20.00%	\$204.45
December 2012	\$567.17	16.00	20.00%	\$113.43
January 2013	\$1,259.65	15.00	20.00%	\$251.93
February 2013	\$98.93	14.00	20.00%	\$19.79
March 2013	\$253.91	13.00	20.00%	\$50.78
April 2013	\$82.44	12.00	19.56%	\$16.13
May 2013	\$478.14	11.00	17.79%	\$85.06
June 2013	\$202.67	10.00	16.05%	\$32.53
August 2013	\$940.27	8.00	12.65%	\$118.94
September 2013	\$654.53	7.00	10.98%	\$71.87
Total Discrepancies \$12,366.46				
Total Damages this Schedule				\$2,326.20
20% of Discrepancies				\$2,473.29
Assessed Damages				\$2,326.20

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

February 2012

Page # :

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * * Actual Hours Per Week * * * * *						Benefit Hour Difference
					PE Date 4-Feb	PE Date 11-Feb	PE Date 18-Feb	PE Date 25-Feb	PE Date 29-Feb	Total Hours	
	GOLEMA MARTY	P1	45.50	45.50	6.00	0.00	40.00	0.00	0.00	46.00	0.50
	GOLEMA MARTY	CD15	0.00	0.00	5.00	0.00	0.00	0.00	0.00	5.00	5.00

Total Items Listed in this Period:

2.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

May 2012

Page #:

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Benefit Hour Difference
					PE Date 5-May	PE Date 12-May	PE Date 19-May	PE Date 26-May	PE Date 31-May		
1	GOLEMA MARTY	P1	70.50	70.50	40.00	0.00	6.00	0.00	0.00	46.00	(24.50)
	GOLEMA MARTY	P1T	0.00	0.00	24.50	0.00	0.00	0.00	0.00	24.50	24.50
	GOLEMA MARTY	CD15	0.00	0.00	46.50	0.00	0.00	0.00	0.00	46.50	46.50
	Pecour Decorations	CD43	0.00	0.00	0.00	219.00	0.00	0.00	0.00	219.00	219.00
Total					111.00	219.00	6.00	0.00	0.00	336.00	265.50

Total Items Listed in this Period:

4.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

June 2012

Page #:

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Benefit Hour Difference
					PE Date 2-Jun	PE Date 9-Jun	PE Date 16-Jun	PE Date 23-Jun	PE Date 30-Jun	Total Hours	
1	GOLEMA MARTY Pecour Decorations	P1	109.50	109.50	40.00	40.00	25.50	25.00	21.00	151.50	42.00
		CD43	0.00	0.00	0.00	0.00	0.00	0.00	37.25	37.25	37.25

Total Items Listed in this Period:

2.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

July 2012

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * *Actual Hours Per Week* * * * *						Benefit Hour Difference
					PE Date 7-Jul	PE Date 14-Jul	PE Date 21-Jul	PE Date 28-Jul	PE Date 31-Jul	Total Hours	
	GOLEMA MARTY	P1	140.00	140.00	21.00	35.00	74.00	0.00	16.00	146.00	6.00

Total Items Listed in this Period:

1.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

August 2012

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Benefit Hour Difference
					PE Date 4-Aug	PE Date 11-Aug	PE Date 18-Aug	PE Date 25-Aug	PE Date 31-Aug	Total Hours	
	GOLEMA MARTY	P1	117.00	117.00	19.00	42.00	40.00	40.00	0.00	141.00	24.00
	GOLEMA MARTY	CD15	0.00	0.00	4.75	0.00	0.00	0.00	0.00	4.75	4.75

Total Items Listed in this Period:

2.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

September 2012

Page # :

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Benefit Hour Difference
					PE Date 1-Sep	PE Date 8-Sep	PE Date 15-Sep	PE Date 22-Sep	PE Date 29-Sep	Total Hours	
	GOLEMA MARTY	P1	46.00	46.00	22.00	30.00	0.00	0.00	40.00	92.00	46.00
	GOLEMA MARTY	CD15	0.00	0.00	48.00	0.00	0.00	0.00	0.00	48.00	48.00
Total					70.00	30.00	0.00	0.00	40.00	140.00	94.00

Total Items Listed in this Period:

2.00

Monthly Detail Report

Account Number: 51200

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

October 2012

Page # :

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Benefit Hour Difference
					PE Date 6-Oct	PE Date 13-Oct	PE Date 20-Oct	PE Date 27-Oct	PE Date 31-Oct		
.	GOLEMA MARTY	P1	57.50	57.50	4.00	0.00	0.00	4.00	0.00	8.00	(49.50)
:	GOLEMA MARTY	P1T	0.00	0.00	41.50	0.00	0.00	0.00	0.00	41.50	41.50
.	GOLEMA MARTY	CD15	0.00	0.00	62.50	0.00	0.00	0.00	0.00	62.50	62.50
Total					108.00	0.00	0.00	4.00	0.00	112.00	54.50

Total Items Listed in this Period:

3.00

14 CV 07433

Exhibit A-3

Records Reviewed

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123	Phone:	(847) 888-8181
Phone:	(847) 888-8181		

Audit Results	
Discrepancy Total Hours	382.00
Discrepancy Benefit Hours	382.00
Discrepancy Amount	\$9,684.53
Liquidated Damages	\$1,936.91
Grand Total	\$ 11,621.44

Associated Account(s)
Partition Pros Inc (#51200)

Reviewed	Employer Records
Yes	Annual Federal Unemployment Tax Return (940)
Yes	Bank Statements
No	Cash Disbursement Journals
Yes	Check Register / Cancelled Checks / Vouchers
N/A	Construction Loan Data
N/A	Contribution Reports to All Other Funds
Yes	Contribution Reports to Audited Funds
Yes	Federal Income Tax Returns (1120 or 1065)
No	General Ledgers
No	Individual Earnings Records
Incomplete	Invoices from Sub-Contractors
No	Job List/Job Cost Records
N/A	Miscellaneous Income Payment Reports (1099)
Yes	Payroll Journals
Yes	Quarterly Federal Tax Returns (941)
Yes	Quarterly Unemployment Wage Reports
N/A	Summary of Information Returns (1096)
Yes	Time Cards
Yes	Transmittal of Income and Tax Statements (W-3)
No	Vendor List
Yes	Wage and Tax Statements (W-2)

Audit Type: Random

Separate Credit Report

Date Reviewed:

6/2/14

Reviewer:

Vivian Canale CPA

Discrepancy Summary By Month

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206
Elgin, IL 60123
Phone: (847) 888-8181

Contact: Kevin Duros
Title: Owner/President

Page: 1 of 23

[illegible]

Discrepancy Summary By Error Type

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123		
Phone:	(847) 888-8181	Page:	2 of 23

Code	Description	Dollar Amount
SIGNATORY EMPLOYER: PAYROLL		
P1	Clerical Error	\$15.13
P1T	Clerical Error - Time Card	\$1,611.51
P3	Omission	\$2,179.29
P3T	Omission - Time Card	\$646.55
P7	Electronic Record Identified as Carpenter Not Reported	\$644.88
SIGNATORY EMPLOYER: CASH DISBURSEMENTS		
CD3	Omission	\$526.24
CD15	Bonus/Additional Pay	\$4,060.93
Sub-Total Discrepancies From All Listed Codes		\$9,684.53
Liquidated Damages		\$1,936.91
Total Amount Due		\$11,621.44

Liquidated Damages Schedule

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206 Elgin, IL 60123	Title:	Owner/President
Phone:	(847) 888-8181	Page:	3 of 23

Reporting Period	Contributions Due	Compounding Periods	Calculating Percentage	Total Liquidated Damages Owed
February 2012	\$42.56	26.00	20.00%	\$8.51
March 2012	\$145.92	25.00	20.00%	\$29.18
April 2012	\$2,286.08	24.00	20.00%	\$457.22
May 2012	\$1,793.60	23.00	20.00%	\$358.72
June 2012	(\$949.79)			
July 2012	(\$654.59)			
August 2012	\$231.03	20.00	20.00%	\$46.21
September 2012	\$32.09	19.00	20.00%	\$6.42
October 2012	\$583.99	18.00	20.00%	\$116.80
November 2012	\$314.46	17.00	20.00%	\$62.89
December 2012	\$365.80	16.00	20.00%	\$73.16
January 2013	(\$77.01)			
February 2013	\$320.88	14.00	20.00%	\$64.18
March 2013	\$378.63	13.00	20.00%	\$75.73
April 2013	\$1,450.36	12.00	19.56%	\$283.69
May 2013	\$834.28	11.00	17.79%	\$148.42
June 2013	\$1,262.89	10.00	16.05%	\$202.69
July 2013	\$73.89	9.00	14.34%	\$10.60
August 2013	\$523.97	8.00	12.65%	\$66.28
September 2013	\$725.49	7.00	10.98%	\$79.66
Total Discrepancies				\$9,684.53
Total Damages this Schedule				\$2,090.36
20% of Discrepancies				\$1,936.91
Assessed Damages				\$1,936.91

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: February 2012

Phone: (847) 888-8181

Page #: 4 of 23

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 4-Feb	PE Date 11-Feb	PE Date 18-Feb	PE Date 25-Feb	PE Date 29-Feb	Total Hours			
	JEPPESEN ERIC R	P1	40.00	40.00	8.00	12.00	0.00	0.00	20.00	40.00		0.00	0.00
	JEPPESEN ERIC R	CD15	0.00	0.00	1.75	0.00	0.00	0.00	0.00	1.75		1.75	1.75
Total					9.75	12.00	0.00	0.00	20.00	41.75		1.75	1.75

Total Items Listed in this Period: 2.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: March 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 3-Mar	PE Date 10-Mar	PE Date 17-Mar	PE Date 24-Mar	PE Date 31-Mar	Total Hours			
	COSTELLO JAMES P	P1	102.00	102.00	7.00	26.50	24.00	8.00	37.00	102.50		0.50	0.50
	COSTELLO JAMES P	CD15	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1.00		1.00	1.00
	JEPPESEN ERIC R	P1	85.00	85.00	0.00	13.00	24.00	8.00	40.00	85.00		0.00	0.00
	JEPPESEN ERIC R	CD15	0.00	0.00	4.50	0.00	0.00	0.00	0.00	4.50		4.50	4.50
Total					12.50	39.50	48.00	16.00	77.00	193.00		6.00	6.00

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month: April 2012

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 7-Apr	PE Date 14-Apr	PE Date 21-Apr	PE Date 28-Apr	PE Date 30-Apr				
	COSTELLO JAMES P	P1	80.50	80.50	32.00	0.00	0.00	40.00	8.50	80.50		0.00	0.00
	COSTELLO JAMES P	CD15	0.00	0.00	3.75	0.00	0.00	0.00	0.00	3.75		3.75	3.75
	SMRZ JOHN J	P3	0.00	0.00	0.00	0.00	0.00	40.00	0.00	40.00		40.00	40.00
	SMRZ JOHN J	CD15	0.00	0.00	50.25	0.00	0.00	0.00	0.00	50.25		50.25	50.25
Total					86.00	0.00	0.00	80.00	8.50	174.50		94.00	94.00

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: May 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 5-May	PE Date 12-May	PE Date 19-May	PE Date 26-May	PE Date 31-May				
	COSTELLO JAMES P	P1	38.50	38.50	0.00	26.00	0.00	20.00	16.00	62.00		23.50	23.50
	COSTELLO JAMES P	CD15	0.00	0.00	1.75	0.00	0.00	0.00	0.00	1.75		1.75	1.75
	JEPPESEN ERIC R	P1	77.50	77.50	12.50	23.00	18.50	18.00	16.00	88.00		10.50	10.50
	JEPPESEN ERIC R	P1T	0.00	0.00	6.00	0.00	0.00	0.00	0.00	6.00		6.00	6.00
	JEPPESEN ERIC R	CD15	0.00	0.00	3.50	0.00	0.00	0.00	0.00	3.50		3.50	3.50
	SMRZ JOHN J	P1	27.50	27.50	40.00	0.00	0.00	16.00	0.00	56.00		28.50	28.50
Total					63.75	49.00	18.50	54.00	32.00	217.25		73.75	73.75

Total Items Listed in this Period: 6.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: June 2012

Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 2-Jun	PE Date 9-Jun	PE Date 16-Jun	PE Date 23-Jun	PE Date 30-Jun	Total Hours			
	COSTELLO JAMES P	P1	100.50	100.50	0.00	12.00	18.00	24.50	30.00	84.50		(16.00)	(16.00) ok
	JEPPESEN ERIC R	P1	99.50	99.50	0.00	16.00	25.50	25.50	16.50	83.50		(16.00)	(16.00) ok
	SMRZ JOHN J	P1	81.00	81.00	0.00	30.00	24.00	0.00	22.00	76.00		(5.00)	(5.00) ok
Total					0.00	58.00	67.50	50.00	68.50	244.00		(37.00)	(37.00)

Total Items Listed in this Period: 3.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: July 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 7-Jul	PE Date 14-Jul	PE Date 21-Jul	PE Date 28-Jul	PE Date 31-Jul	Total Hours			
	JEPPESEN ERIC R	P1	85.50	85.50	12.50	0.00	67.50	0.00	13.50	93.50		8.00	8.00
	SMRZ JOHN J	P1	83.50	83.50	4.00	32.00	14.00	0.00	0.00	50.00		(33.50)	(33.50)
Total					16.50	32.00	81.50	0.00	13.50	143.50		(25.50)	(25.50)

Total Items Listed in this Period: 2.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: August 2012

Elgin, IL 60123

Page #: 10 of 23

Phone: (847) 888-8181

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 4-Aug	PE Date 11-Aug	PE Date 18-Aug	PE Date 25-Aug	PE Date 31-Aug				
	JEPPESEN ERIC R	P1	83.50	83.50	12.00	33.50	14.50	12.00	14.00	86.00		2.50	2.50
	JEPPESEN ERIC R	CD15	0.00	0.00	6.50	0.00	0.00	0.00	0.00	6.50		6.50	6.50
Total					18.50	33.50	14.50	12.00	14.00	92.50		9.00	9.00

Total Items Listed in this Period: 2.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: September 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 1-Sep	PE Date 8-Sep	PE Date 15-Sep	PE Date 22-Sep	PE Date 29-Sep	Total Hours			
	JEPPESEN ERIC R	P1	43.50	43.50	0.00	0.00	0.00	0.00	39.00	39.00		(4.50)	(4.50)
	JEPPESEN ERIC R	P1T	0.00	0.00	4.50	0.00	0.00	0.00	0.00	4.50		4.50	4.50
	JEPPESEN ERIC R	CD15	0.00	0.00	1.25	0.00	0.00	0.00	0.00	1.25		1.25	1.25
Total					5.75	0.00	0.00	0.00	39.00	44.75		1.25	1.25

Total Items Listed in this Period: 3.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: October 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 6-Oct	PE Date 13-Oct	PE Date 20-Oct	PE Date 27-Oct	PE Date 31-Oct	Total Hours			
	JEPPESEN ERIC R	P1	40.50	40.50	0.00	0.00	0.00	20.50	0.00	20.50		(20.00)	(20.00)
	JEPPESEN ERIC R	P1T	0.00	0.00	20.00	0.00	0.00	0.00	0.00	20.00		20.00	20.00
	JEPPESEN ERIC R	CD15	0.00	0.00	1.75	0.00	0.00	0.00	0.00	1.75		1.75	1.75
	SMRZ JOHN J	P3T	0.00	0.00	21.00	0.00	0.00	0.00	0.00	21.00		21.00	21.00
Total					42.75	0.00	0.00	20.50	0.00	63.25		22.75	22.75

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period:

January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month:

November 2012

Page # :

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 3-Nov	PE Date 10-Nov	PE Date 17-Nov	PE Date 24-Nov	PE Date 30-Nov	Total Hours			
	JEPPESEN ERIC R	P1	67.00	67.00	25.00	30.00	0.00	0.00	0.00	55.00		(12.00)	(12.00)
	JEPPESEN ERIC R	P1T	0.00	0.00	8.00	0.00	0.00	0.00	0.00	8.00		8.00	8.00
	JEPPESEN ERIC R	CD15	0.00	0.00	16.25	0.00	0.00	0.00	0.00	16.25		16.25	16.25
Total					49.25	30.00	0.00	0.00	0.00	79.25		12.25	12.25

Total Items Listed in this Period: 3.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: December 2012

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 1-Dec	PE Date 8-Dec	PE Date 15-Dec	PE Date 22-Dec	PE Date 29-Dec				
	COSTELLO JAMES P	CD3	0.00	0.00	20.50	0.00	0.00	0.00	0.00	20.50		20.50	20.50
	JEPPESEN ERIC R	P1	46.00	46.00	37.00	0.00	0.00	0.00	0.00	37.00		(9.00)	(9.00)
	JEPPESEN ERIC R	P1T	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1.00		1.00	1.00
	JEPPESEN ERIC R	CD15	0.00	0.00	1.75	0.00	0.00	0.00	0.00	1.75		1.75	1.75
Total					60.25	0.00	0.00	0.00	0.00	60.25		14.25	14.25

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: January 2013

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 5-Jan	PE Date 12-Jan	PE Date 19-Jan	PE Date 26-Jan	PE Date 31-Jan	Total Hours			
	JEPPESEN ERIC R	P1T	38.50	38.50	27.00	0.00	0.00	0.00	0.00	27.00		(11.50)	(11.50)
	JEPPESEN ERIC R	CD15	0.00	0.00	8.50	0.00	0.00	0.00	0.00	8.50		8.50	8.50
					Total	35.50	0.00	0.00	0.00	0.00	35.50	(3.00)	(3.00)

Total Items Listed in this Period: 2.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month: February 2013

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 2-Feb	PE Date 9-Feb	PE Date 16-Feb	PE Date 23-Feb	PE Date 28-Feb				
	JEPPSEN ERIC R	P1	77.50	77.50	0.00	37.50	30.50	34.00	0.00	102.00		24.50	24.50
	JEPPSEN ERIC R	CD15	0.00	0.00	3.50	0.00	0.00	0.00	0.00	3.50		3.50	3.50
	LINARES MICHAEL A	P1	30.00	30.00	0.00	0.00	0.00	10.50	0.00	10.50		(19.50)	(19.50)
	PECIULIS ADAM B	P1	26.00	26.00	0.00	0.00	8.00	19.00	0.00	27.00		1.00	1.00
	SMRZ JOHN J	P1	55.00	55.00	7.00	0.00	21.00	30.00	0.00	58.00		3.00	3.00
Total					10.50	37.50	59.50	93.50	0.00	201.00		12.50	12.50

Total Items Listed in this Period: 5.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: March 2013

Elgin, IL 60123
Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 2-Mar	PE Date 9-Mar	PE Date 16-Mar	PE Date 23-Mar	PE Date 30-Mar	Total Hours			
	JEPPESEN ERIC R	P1	81.00	81.00	21.00	20.00	17.00	7.00	29.00	94.00		13.00	13.00
	JEPPESEN ERIC R	CD15	0.00	0.00	2.75	0.00	0.00	0.00	0.00	2.75		2.75	2.75
	SMRZ JOHN J	P1	76.00	76.00	0.00	0.00	21.00	14.00	33.00	68.00		(8.00)	(8.00)
	SMRZ JOHN J	P1T	0.00	0.00	7.00	0.00	0.00	0.00	0.00	7.00		7.00	7.00
Total					30.75	20.00	38.00	21.00	62.00	171.75		14.75	14.75

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: April 2013

Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 6-Apr	PE Date 13-Apr	PE Date 20-Apr	PE Date 27-Apr	PE Date 30-Apr				
	SMRZ JOHN J	P3	0.00	0.00	8.00	6.00	13.00	16.00	0.00	43.00		43.00	43.00
	SMRZ JOHN J	CD15	0.00	0.00	9.50	0.00	0.00	0.00	0.00	9.50		9.50	9.50
	Wakitsch Mark T	P3	0.00	0.00	0.00	0.00	0.00	4.00	0.00	4.00		4.00	4.00
Total					17.50	6.00	13.00	20.00	0.00	56.50		56.50	56.50

Total Items Listed in this Period: 3.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: May 2013

Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 4-May	PE Date 11-May	PE Date 18-May	PE Date 25-May	PE Date 31-May				
	JEPPESEN ERIC R	P1	72.50	72.50	0.00	0.00	40.00	31.50	24.00	95.50		23.00	23.00
	SMRZ JOHN J	P1	36.00	36.00	0.00	6.00	4.00	4.00	0.00	14.00		(22.00)	(22.00)
	SMRZ JOHN J	P1T	0.00	0.00	26.00	0.00	0.00	0.00	0.00	26.00		26.00	26.00
	SMRZ JOHN J	CD15	0.00	0.00	5.50	0.00	0.00	0.00	0.00	5.50		5.50	5.50
Total					31.50	6.00	44.00	35.50	24.00	141.00		32.50	32.50

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: June 2013

Phone: (847) 888-8181

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Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 1-Jun	PE Date 8-Jun	PE Date 15-Jun	PE Date 22-Jun	PE Date 29-Jun				
	JEPPESEN ERIC R	P1	130.00	130.00	0.00	36.00	28.00	38.00	28.00	130.00		0.00	0.00
	JEPPESEN ERIC R	CD15	0.00	0.00	20.00	0.00	0.00	0.00	0.00	20.00		20.00	20.00
	SMRZ JOHN J	P1	103.00	103.00	20.00	27.00	32.00	22.00	29.00	130.00		27.00	27.00
Total					40.00	63.00	60.00	60.00	57.00	280.00		47.00	47.00

Total Items Listed in this Period: 3.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: July 2013

Phone: (847) 888-8181

Page #: 21 of 23

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 6-Jul	PE Date 13-Jul	PE Date 20-Jul	PE Date 27-Jul	PE Date 31-Jul	Total Hours			
	JEPPESEN ERIC R	P1	104.00	104.00	11.50	30.00	25.00	18.00	13.50	98.00		(6.00)	(6.00)
	JEPPESEN ERIC R	CD15	0.00	0.00	3.75	0.00	0.00	0.00	0.00	3.75		3.75	3.75
	SMRZ JOHN J	P1	65.50	65.50	19.00	25.50	12.00	12.00	0.00	68.50		3.00	3.00
	SMRZ JOHN J	P1T	0.00	0.00	2.00	0.00	0.00	0.00	0.00	2.00		2.00	2.00
Total					36.25	55.50	37.00	30.00	13.50	172.25		2.75	2.75

Total Items Listed in this Period: 4.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: August 2013

Phone: (847) 888-8181

Page #: 22 of 23

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *					Total Hours	Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 3-Aug	PE Date 10-Aug	PE Date 17-Aug	PE Date 24-Aug	PE Date 31-Aug				
	JEPPESEN ERIC R	P1	104.00	104.00	18.50	35.00	14.00	20.00	22.00	109.50		5.50	5.50
	JEPPESEN ERIC R	CD15	0.00	0.00	2.00	0.00	0.00	0.00	0.00	2.00		2.00	2.00
	Lucin David B	P7	0.00	0.00	0.00	0.00	0.00	0.00	8.00	8.00		8.00	8.00
	SMRZ JOHN J	P1	99.50	99.50	15.00	23.00	26.00	20.00	16.00	100.00		0.50	0.50
	SMRZ JOHN J	CD15	0.00	0.00	3.50	0.00	0.00	0.00	0.00	3.50		3.50	3.50
Total					39.00	58.00	40.00	40.00	46.00	223.00		19.50	19.50

Total Items Listed in this Period: 5.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123
 Phone: (847) 888-8181

Month: September 2013

Page #: 23 of 23

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 7-Sep	PE Date 14-Sep	PE Date 21-Sep	PE Date 28-Sep	PE Date 30-Sep	Total Hours			
	COSTELLO JAMES P	P3T	0.00	0.00	0.00	0.00	4.00	0.00	0.00	4.00		4.00	4.00
	Sanchez Jose	P7	0.00	0.00	16.00	0.00	0.00	0.00	0.00	16.00		16.00	16.00
	SMRZ JOHN J	CD15	0.00	0.00	7.00	0.00	0.00	0.00	0.00	7.00		7.00	7.00
	SMRZ JOHN J	P1	17.00	17.00	6.00	5.00	6.00	0.00	0.00	17.00		0.00	0.00
Total					29.00	5.00	10.00	0.00	0.00	44.00		27.00	27.00

Total Items Listed in this Period: 4.00

14 CV 07433

Exhibit A-4

Records Reviewed

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123	Phone:	(847) 888-8181
Phone:	(847) 888-8181		

Audit Results	
Discrepancy Total Hours	(36.00)
Discrepancy Benefit Hours	(36.00)
Discrepancy Amount	(\$924.12)
Liquidated Damages	\$0.00
Grand Total	\$ (924.12)

Associated Account(s)
Partition Pros Inc (#51200)

Reviewed	Employer Records
Yes	Annual Federal Unemployment Tax Return (940)
Yes	Bank Statements
No	Cash Disbursement Journals
Yes	Check Register / Cancelled Checks / Vouchers
N/A	Construction Loan Data
N/A	Contribution Reports to All Other Funds
Yes	Contribution Reports to Audited Funds
Yes	Federal Income Tax Returns (1120 or 1065)
No	General Ledgers
No	Individual Earnings Records
Incomplete	Invoices from Sub-Contractors
No	Job List/Job Cost Records
N/A	Miscellaneous Income Payment Reports (1099)
Yes	Payroll Journals
Yes	Quarterly Federal Tax Returns (941)
Yes	Quarterly Unemployment Wage Reports
N/A	Summary of Information Returns (1096)
Yes	Time Cards
Yes	Transmittal of Income and Tax Statements (W-3)
No	Vendor List
Yes	Wage and Tax Statements (W-2)

Audit Type: Separate Credit Report

Date Reviewed:

6/2/14

Reviewer:

Victor Arnold CPA

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206 Elgin, IL 60123	Title:	Owner/President
Phone:	(847) 888-8181	Page:	1 of 4

[illegible]

Discrepancy Summary By Error Type

Account Number:	24772	Audit Period:	January 1, 2012 to September 30, 2013
Employer:	Partition Pros Inc	Contact:	Kevin Duros
Address:	1330 Crispin St Unit 206	Title:	Owner/President
	Elgin, IL 60123		
Phone:	(847) 888-8181	Page:	2 of 4

Code	Description	Dollar Amount
SIGNATORY EMPLOYER: PAYROLL		
P18	No Payroll or Payments Noted	(\$924.12)
Sub-Total Discrepancies From All Listed Codes		(\$924.12)
Liquidated Damages		\$0.00
Total Amount Due		(\$924.16)

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206

Month: November 2012

Elgin, IL 60123

Page #: 3 of 4

Phone: (847) 888-8181

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 3-Nov	PE Date 10-Nov	PE Date 17-Nov	PE Date 24-Nov	PE Date 30-Nov	Total Hours			
	SMRZ JOHN J	P18	4.00	4.00	0.00	0.00	0.00	0.00	0.00	0.00		(4.00)	(4.00)
Total					0.00	0.00	0.00	0.00	0.00	0.00		(4.00)	(4.00)

Total Items Listed in this Period: 1.00

Monthly Detail Report

Account Number: 24772

Audit Period: January 1, 2012 to September 30, 2013

 Employer: Partition Pros Inc
 Address: 1330 Crispin St Unit 206
 Elgin, IL 60123

Month: April 2013

Phone: (847) 888-8181

Page #: 4 of 4

Reference Number	Employee / Payee Name	Error Code	Total Hours Reported	Benefit Hours Reported	* * * * * Actual Hours Per Week * * * * *						Capped Hours	Total Hour Difference	Benefit Hour Difference
					PE Date 6-Apr	PE Date 13-Apr	PE Date 20-Apr	PE Date 27-Apr	PE Date 30-Apr	Total Hours			
;	SOWA ALAN Z	P18	32.00	32.00	0.00	0.00	0.00	0.00	0.00	0.00		(32.00)	(32.00)
Total					0.00	0.00	0.00	0.00	0.00	0.00		(32.00)	(32.00)

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Total Items Listed in this Period: 1.00

14 CV 07433

Exhibit A-5



Your Future — Our Focus

**Chicago Regional Council of Carpenters
Welfare, Pension and Supplemental Retirement Funds**

12 East Erie Street • Chicago, Illinois 60611
(312) 787-9455 • Kristina M. Guastaferrri, Administrator
www.crcbenefits.org

Partition Pros Inc
1330 Crispin St Unit 206
Elgin, IL 60123

June 27, 2014

Account Nos.: 24772 & 51200

Dear Sir/Madam:

Enclosed is a copy of the Fringe Benefit Funds' audit report recently performed by Legacy Professionals, L.L.P., Certified Public Accountants, for the period January 2012 through September 2013.

	<u>Acct# 24772</u>	<u>Acct# 51200</u>	<u>Combined Total</u>
Audit Discrepancies	\$9,684.53	\$12,366.46	\$22,050.99
Liquidated Damages	\$1,936.91	\$2,326.20	\$4,263.11
Credit Report	(\$924.12)		(\$924.12)
Total Amount Due	\$10,697.32	\$14,692.66	<u>\$25,389.98</u>

Please review the audit report against your records and if any discrepancy is found, call me at (312) 787-9455, ext. 790.

If you fail to pay the audit deficiency within fifteen (15) days, then the audit deficiency will be billed on a separate Audit Receivables Statement each month and will be subject to additional liquidated damages at the rate of 1 1/2% per month, compounded. Any deficiencies not paid in a timely manner will be referred to the Funds' legal counsel for collection.

Your cooperation is appreciated.

Sincerely,

John Conklin, Sr. Audit Coordinator
Employer Contributions Dept.
jconklin@crcbenefits.org



Your Future — Our Focus

**Chicago Regional Council of Carpenters
Welfare, Pension and Supplemental Retirement Funds**

12 East Erie Street • Chicago, Illinois 60611
(312) 787-9455 • Kristina M. Guastaferrri, Administrator
www.crcbenefits.org

July 31, 2014

Partition Pros Inc
1330 Crispin St Unit 206
Elgin, IL 60123

Account No.: 24772 & 51200

Dear Sir/Madam:

The Fund Office has sought payment of the audit deficiency of \$25,389.98 * covering the period January 2012 through September 2013 or any disputing documentation that you may have. Unless this payment is made or documents are received within ten (10) days, we will call for a full performance on your bond and/or refer this matter to Fund legal counsel for collection. The Funds' attorneys will file suit in the United States District Court seeking the audit deficiency, interest, liquidated damages, audit fees, attorney fees and court costs.

If you wish to avoid the imposition of these additional charges, which could be substantial, please make payment within ten (10) days.

If payment has been sent, please disregard this notice.

Sincerely,

John Conklin
Sr. Audit Coordinator
Employer Contributions
jconklin@crcbenefits.org

*This amount includes current liquidated damages.

14 CV 07433

Exhibit A-6

Interest & Damages Summary

Account Number: 24772

Calculation Date: November 17, 2014

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206
Elgin, IL 60123

Reporting Period	Delinquency Amount	Interest	Liquidated Damages	Total Due
February 2012	\$42.56	\$3.57	\$8.51	\$54.64
March 2012	\$145.92	\$11.88	\$29.18	\$186.98
April 2012	\$2,286.08	\$179.98	\$457.22	\$2,923.28
May 2012	\$1,793.60	\$136.29	\$358.72	\$2,288.61
June 2012	(\$949.79)	(\$69.67)	(\$189.96)	(\$1,209.42)
July 2012	(\$654.59)	(\$46.27)	(\$130.92)	(\$831.78)
August 2012	\$231.03	\$15.70	\$46.21	\$292.94
September 2012	\$32.09	\$2.04	\$6.42	\$40.55
October 2012	\$583.99	\$36.58	\$116.80	\$737.37
November 2012	\$314.46	\$18.88	\$62.89	\$396.23
December 2012	\$365.80	\$21.00	\$73.16	\$459.96
January 2013	(\$77.01)	(\$4.21)	(\$15.40)	(\$96.62)
February 2013	\$320.88	\$16.73	\$64.18	\$401.79
March 2013	\$378.63	\$18.73	\$75.73	\$473.09
April 2013	\$1,450.36	\$68.03	\$290.07	\$1,808.46
May 2013	\$834.28	\$36.90	\$166.86	\$1,038.04
June 2013	\$1,262.89	\$52.64	\$252.58	\$1,568.11
July 2013	\$73.89	\$2.91	\$14.78	\$91.58
August 2013	\$523.97	\$19.08	\$104.79	\$647.84
September 2013	\$725.49	\$24.60	\$145.10	\$895.19
Separate Credit Audit	(\$924.12)			(\$924.12)
Totals	\$8,760.41	\$545.39	\$1,936.92	\$11,242.72

Interest & Damages Summary

Account Number: 51200

Calculation Date: November 17, 2014

Employer: Partition Pros Inc
Address: 1330 Crispin St Unit 206
Elgin, IL 60123

Reporting Period	Delinquency Amount	Interest	Liquidated Damages	Total Due
February 2012	\$67.87	\$5.69	\$13.57	\$87.13
May 2012	\$3,276.27	\$248.97	\$655.25	\$4,180.49
June 2012	\$1,045.31	\$76.72	\$209.06	\$1,331.09
July 2012	\$79.14	\$5.60	\$15.83	\$100.57
August 2012	\$379.21	\$25.78	\$75.84	\$480.83
September 2012	\$1,239.86	\$81.04	\$247.97	\$1,568.87
October 2012	\$718.86	\$45.03	\$143.77	\$907.66
November 2012	\$1,022.23	\$61.40	\$204.45	\$1,288.08
December 2012	\$567.17	\$32.56	\$113.43	\$713.16
January 2013	\$1,259.65	\$68.76	\$251.93	\$1,580.34
February 2013	\$98.93	\$5.17	\$19.79	\$123.89
March 2013	\$253.91	\$12.55	\$50.78	\$317.24
April 2013	\$82.44	\$3.86	\$16.49	\$102.79
May 2013	\$478.14	\$21.16	\$95.63	\$594.93
June 2013	\$202.67	\$8.45	\$40.53	\$251.65
August 2013	\$940.27	\$34.25	\$188.05	\$1,162.57
September 2013	\$654.53	\$22.20	\$130.91	\$807.64
Totals	\$12,366.46	\$759.19	\$2,473.28	\$15,598.93

14 CV 07433

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	14 CV 07433
v.)	
)	
PARTITION PROS, INC., a dissolved Illinois)	
corporation and KEVIN J. DUROS,)	Judge Kocoras
individually and doing business as Partition)	
Pros, Inc.)	
)	
Defendant.)	

ORDER

Pursuant to Federal Rule of Civil Procedure 55, a judgment by default is hereby entered in favor of the Chicago Regional Council of Carpenters Pension Fund *et al.* ("Trust Funds") and against defendants PARTITION PROS, INC., a dissolved Illinois corporation and KEVIN J. DUROS, individually and doing business as Partition Pros, Inc. (collectively, "Defendants") in the amount of \$33,766.92 as follows:

- A. \$21,126.87 in unpaid contributions pursuant to the audit;
- B. \$5,083.20 for auditor's fees incurred by the Trust Funds to complete the audit of Defendants' books and records;
- C. \$1,304.58 in interest;
- D. \$4,410.20 in liquidated damages; and
- E. \$1,842.07 in reasonable attorneys' fees and costs the Trust Funds incurred in this action.

The Trust Funds shall also recover reasonable attorney' fees and costs incurred by the Trust Funds in enforcing this order and any such further relief as this Court deems appropriate.

Date

Judge Charles P. Kocoras

14 CV 07433

Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)	
CARPENTERS PENSION FUND, <i>et al.</i> ,)	
)	14 CV 07433
Plaintiffs,)	
v.)	
)	
PARTITION PROS, INC., <i>et al.</i> ,)	Judge Kocoras
)	
Defendants.)	

DECLARATION OF KEVIN P. MCJESSY

I, Kevin P. McJessy, hereby declare, under penalty of perjury pursuant to the laws of the United States, that the following statements are true:

1. I am one of the attorneys representing the Chicago Regional Council of Carpenters Pension Fund, the Chicago Regional Council of Carpenters Welfare Fund, the Chicago and Northeast Illinois Regional Council of Carpenter Apprentice and Trainee Program, and the Labor/Management Union Carpentry Cooperation Promotion Fund (collectively “the Trust Funds”) in the above-captioned lawsuit (“Lawsuit”) against PARTITION PROS, INC., an Illinois corporation (“Partition”) and KEVIN J. DUROS (“Duros”) (Partition and Duros are hereinafter collectively referred to as “Defendants”).

2. I have been licensed to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois since 1995. I am an attorney with McJessy, Ching & Thompson, LLC (“MC&T”).

3. As part of my practice, I handle claims under ERISA. I personally represented the Trust Funds in this Lawsuit. I have represented the Trust Funds in this Lawsuit since its inception.

4. The Trust Funds have incurred \$1,842.07 in fees and expenses to compel Defendants to comply with their obligations under the terms of the Collective Bargaining Agreement and applicable trust agreements. A redacted copy of the billing statement from MC&T from the inception of this Lawsuit to the present, redacted to protect privileged communications, is attached as Exhibit C-1. The detailed billing statement describes in detail all work performed by MC&T in this matter.

a) The Trust Funds have collectively incurred fees totaling \$1,024.00 for 7.6 hours of attorney services. The substantially reduced hourly rate for attorneys at MC&T for Trust Funds matters is \$160.00 per hour.

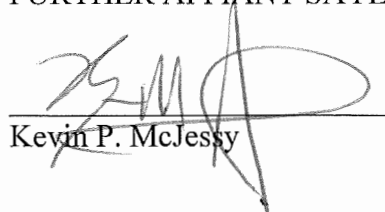
b) The Trust Funds have collectively incurred fees totaling \$102.00 for 1.7 hours of paralegal time. The substantially reduced hourly rate for paralegals at MC&T for Trust Fund matters is \$60.00 per hour.

c) The Trust Funds incurred \$524.07 in expenses for the filing fee, process server charge for service of summons, legal research charge, courier charges and photocopy charges.

5. The attorneys' fees, paralegal fees and costs charged to the Trust Funds in this matter are consistent with MC&T's regular charges for services to the Trust Funds on similar matters and are substantially reduced from MC&T for other clients.

6. I have personal knowledge of the matters stated in this affidavit and could testify competently to them.

FURTHER AFFIANT SAYETH NOT.


Kevin P. McJessey

11/20/14
Date

14 CV 07433

Exhibit C-1

Client Ledger

ALL DATES

Date	Entry #	Received From/Paid To Explanation	Chq# Rec#	----- General -----		Fees	Bld ----- Trust Activity -----		Balance
				Rcpts	Disbs		Inv#	Acc	
1000		Chicago Regional Council of Carpenters -							
0223-PART		Partition Pros, Inc.							
									Resp Lawyer: KM
Sep 23/2014	85578	Lawyer: KM 1.80 Hrs X 160.00 Reviewed audit referral file from client. Reviewed corporate documents of Partition Pros, Inc. and status of corporation. Prepared complaint against defendants.				288.00	8702		
Sep 24/2014	85587	Lawyer: KM 1.20 Hrs X 40.00 Prepared civil cover sheet, summons for Partition Pros, summons for K. Duros, and attorney appearance (.70); filed complaint, civil cover sheet and appearance with court (.70); prepared email correspondence to J. Libby and J. Conklin forwarding file-stamped complaint and advising of judges' assignments (.10); completed summons as appropriate with judges' information and prepared email correspondence to court intake clerk forwarding same for issuance (.70); reviewed issued summons from court and prepared email correspondence to process server forwarding same for service (.20); reviewed Judge Kocoras' website and confirmed that courtesy copy of complaint is required and prepared correspondence to Judge Kocoras' deputy forwarding courtesy copy of same (.20).				74.00	8702		
Sep 24/2014	85594	Final review and edits to complaint prior to filing.				32.00	8702		
Sep 30/2014	85260	US Messenger & Logistics Courier Recovery	4490		17.71		8702		
Sep 30/2014	85271	Midwest Investigations Process Server recovery - Summons and Complaint - Partition Pros and K. Duros	4491		85.00		8702		
Sep 30/2014	85387	Expense Recovery Photocopy Recovery	00297		4.44		8702		
Oct 2/2014	85251	Lawyer: SK 0.40 Hrs X 60.00 Reviewed affidavits of service of summons and complaint served on defendants and filed same with court; prepared correspondence to Judge Kocoras forwarding courtesy copies of same.				24.00	8766		
Oct 8/2014	86051	Lawyer: KM 0.10 Hrs X 160.00 Reviewed ECF court order of Judge Kocoras setting status hearing for 11/25/14 and pre-hearing requirements.				16.00	8766		
Oct 20/2014	85684	Billing on Invoice 8702 FEES 398.00 DISBS 107.15			0.00		8702		
Oct 24/2014	85826	Capital One Services Filing Fee	4499		400.00		8766		
Oct 30/2014	85878	PACER PACR	4509		1.00		8766		
Oct 31/2014	85896	Expense Recovery Photocopy Recovery	00298		1.32		8766		
Nov 4/2014	86446	Lawyer: JS 1.20 Hrs X 160.00 Prepared intuitable rough draft of motion for default including draft order to compel audit. (.6) Prepared initial rough draft declaration of J. Libby declaration. (.6)				192.00			
Nov 13/2014	86118	US Messenger & Logistics Courier Recovery	4523		14.60				
Nov 14/2014	86240	Chicago Regional Council of Carpe FMT -	01537	505.15					
Nov 14/2014	86319	Billing on Invoice 8766 FEES 40.00 DISBS 402.32			0.00		8766		
Nov 17/2014	86452	Lawyer: KM 0.50 Hrs X 160.00 Prepared correspondence to J. Conklin asking [REDACTED]				80.00			

Date	Entry #	Received From/Paid To Explanation	Chq# Rec#	General		Fees	Bld		Trust Activity																																																																																																		
				Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	Balance																																																																																																
		(.1) Revised motion for entry of default; reviewed audit referral file to determine status of audit, audit complete, motion should be for judgment for amount certain. (.4)																																																																																																									
Nov 18/2014	86445	Lawyer: KM 3.10 Hrs X 160.00 Prepared declaration for K. McJessey in support of request for award of attorneys' fees and costs. (.5) Edited and revised declaration of J. Libby and reviewed file materials and pulled exhibits to be attached to declaration of J. Libby and redacted SSN's from audit reports attached to J. Libby's declaration as Exhibits. (1.1) Edited and revised motion for entry of default judgment to make motion a motion for entry of judgment for amount certain. (1.1) Telephone call with J. Conklin regarding [REDACTED] [REDACTED] [REDACTED] (.2) Revised J. Libby declaration based upon credit audit. (.2)				496.00																																																																																																					
Nov 19/2014	86447	Lawyer: KM 0.70 Hrs X 160.00 Prepared correspondence to J. Conklin asking [REDACTED] [REDACTED] attach to J. Libby declaration in support of motion for award of interest and liquidated damages. Reviewed correspondence from J. Conklin forwarding calculation of interest and liquidated damages. (.2) Final review and edits to declaration of J. Libby and to motion for entry of judgment to fill in all damages amounts and to verify amounts against supporting documents. (.5)				112.00																																																																																																					
<table><tr><td colspan="2"></td><td colspan="3">UNBILLED</td><td colspan="2"></td><td colspan="3">BILLED</td><td colspan="2"></td></tr><tr><td>TOTALS</td><td>CHE</td><td>+</td><td>RECOV</td><td>+</td><td>FEEES</td><td>= TOTAL</td><td>DISBS</td><td>+</td><td>FEEES</td><td>+</td><td>TAX - RECEIPTS</td></tr><tr><td>PERIOD</td><td>14.60</td><td></td><td>0.00</td><td></td><td>880.00</td><td>894.60</td><td>509.47</td><td></td><td>438.00</td><td></td><td>0.00 505.15</td></tr><tr><td>END DATE</td><td>14.60</td><td></td><td>0.00</td><td></td><td>880.00</td><td>894.60</td><td>509.47</td><td></td><td>438.00</td><td></td><td>0.00 505.15</td></tr></table> <table><tr><td colspan="2"></td><td colspan="3">UNBILLED</td><td colspan="2"></td><td colspan="3">BILLED</td><td colspan="2"></td></tr><tr><td>FIRM TOTAL</td><td>CHE</td><td>+</td><td>RECOV</td><td>+</td><td>FEEES</td><td>= TOTAL</td><td>DISBS</td><td>+</td><td>FEEES</td><td>+</td><td>TAX - RECEIPTS</td></tr><tr><td>PERIOD</td><td>14.60</td><td></td><td>0.00</td><td></td><td>880.00</td><td>894.60</td><td>509.47</td><td></td><td>438.00</td><td></td><td>0.00 505.15</td></tr><tr><td>END DATE</td><td>14.60</td><td></td><td>0.00</td><td></td><td>880.00</td><td>894.60</td><td>509.47</td><td></td><td>438.00</td><td></td><td>0.00 505.15</td></tr></table>														UNBILLED					BILLED					TOTALS	CHE	+	RECOV	+	FEEES	= TOTAL	DISBS	+	FEEES	+	TAX - RECEIPTS	PERIOD	14.60		0.00		880.00	894.60	509.47		438.00		0.00 505.15	END DATE	14.60		0.00		880.00	894.60	509.47		438.00		0.00 505.15			UNBILLED					BILLED					FIRM TOTAL	CHE	+	RECOV	+	FEEES	= TOTAL	DISBS	+	FEEES	+	TAX - RECEIPTS	PERIOD	14.60		0.00		880.00	894.60	509.47		438.00		0.00 505.15	END DATE	14.60		0.00		880.00	894.60	509.47		438.00		0.00 505.15
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END DATE	14.60		0.00		880.00	894.60	509.47		438.00		0.00 505.15																																																																																																

REPORT SELECTIONS - Client Ledger

Layout Template

Advanced Search Filter

Requested by

Finished

Ver

Matters

Clients

Major Clients

Client Intro Lawyer

Matter Intro Lawyer

Responsible Lawyer

Assigned Lawyer

Type of Law

Select From

Matters Sort by

New Page for Each Lawyer

New Page for Each Matter

No Activity Date

Firm Totals Only

Totals Only

Entries Shown - Billed Only

Entries Shown - Disbursements

Entries Shown - Receipts

Entries Shown - Time or Fees

Entries Shown - Trust

Incl. Matters with Retainer Bal

Incl. Matters with Neg Unbld Disb

Default

None

ADMIN

Thursday, November 20, 2014 at 10:45:13 AM

13.0 SP2 (13.0.20140210)

0223-PART

All

All

All

All

All

All

All

Active, Inactive, Archived Matters

Default

No

No

Dec/31/2199

No

No

No

Yes

Yes

Yes

Yes

No

No